

Amy Gasser Callow

From: William R. Ellis
Sent: Tuesday, November 14, 2006 11:59 AM
To: Amy Gasser Callow
Subject: FW: Kearney

From: Roberts, Michael A. [mailto:MRoberts@Graydon.com]
Sent: Sunday, November 12, 2006 7:48 PM
To: William R. Ellis
Subject: RE: Kearney

You want me to state what happened before I get discovery of what happened? Seems backward to me.

Mike

From: William R. Ellis [mailto:WREllis@WoodLamping.com]
Sent: Wednesday, October 18, 2006 3:40 PM
To: Roberts, Michael A.
Subject: RE: Kearney

I apologize if I misunderstood. It would be helpful however if you made me aware of any specific acts you believe occurred so that we can best focus the discovery efforts to suit the claims. Thanks,

William R. Ellis

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From: Roberts, Michael A. [mailto:MRoberts@Graydon.com]
Sent: Wednesday, October 18, 2006 2:34 PM
To: William R. Ellis
Cc: Roberts, Michael A.
Subject: RE: Kearney

That's not what I told J Barrett. I told him "By Friday I'd list the discovery we need and the reasons we need it." Thanks for confirming that you did not hear that correctly. I wouldn't want that misundersatnding to fester.

Regards, Mike

11/20/2006



From: William R. Ellis [mailto:WREllis@WoodLamping.com]
Sent: Wednesday, October 18, 2006 2:23 PM
To: Roberts, Michael A.
Subject: Kearney

Mike, confirming what you told Judge Barrett, I think that by disclosing the specific allegations of actions by my clients as to each of your claims, we should be able to focus on the issues you wish to discover and resolve disagreements, if any, in our meeting with the court on the 3rd. Please E-mail me your specifics on Friday and I will endeavor to respond early next week as to whatever issues you raise and any that may require additional discussion.

William R. Ellis

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